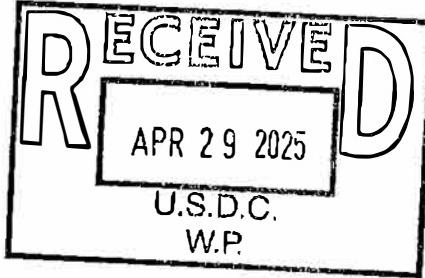


1 Frank Tufano  
25 Dundaff ST  
2 Carbondale, PA 18407  
3 (917)599-2160  
frankatufano@gmail.com



4 U.S. DISTRICT COURT

5 SOUTHERN DISTRICT OF NEW YORK

6 PAUL SALADINO, MD.

7 Plaintiff,

8 vs.

9 FRANK TUFANO

10 FRANKIE'S FREE RANGE MEAT LLC

11 Defendants

Case No.: 6:20-CV-09346

MOTION TO DISMISS

12 1. The entity "Frankie's Free Range Meat LLC," was entered in to this lawsuit. At  
13 the time Frank Tufano's legal counsel did not properly advise him or make the  
14 correct court action.

15 2. This entity falls under Lack of Subject Matter Jurisdiction, as the business  
16 "Frankie's Free Range Meat LLC," has no relevancy to the matter at hand of  
17 trademark/defamation. There is no link of the activities of Frank Tufano's  
18 former business LLC to the current trademark and defamation issue.

19 3. Frank Tufano's statements, opinions, and videos have always been posted on his  
20 own personal social media pages, there is no such social media existing for the  
21

1 York. The financial strain and pressure from various lawsuits, including this one,  
2 resulted in the business becoming financially crippled and being evicted from  
3 their New York location, which can be considered grounds for tortious  
4 interference.

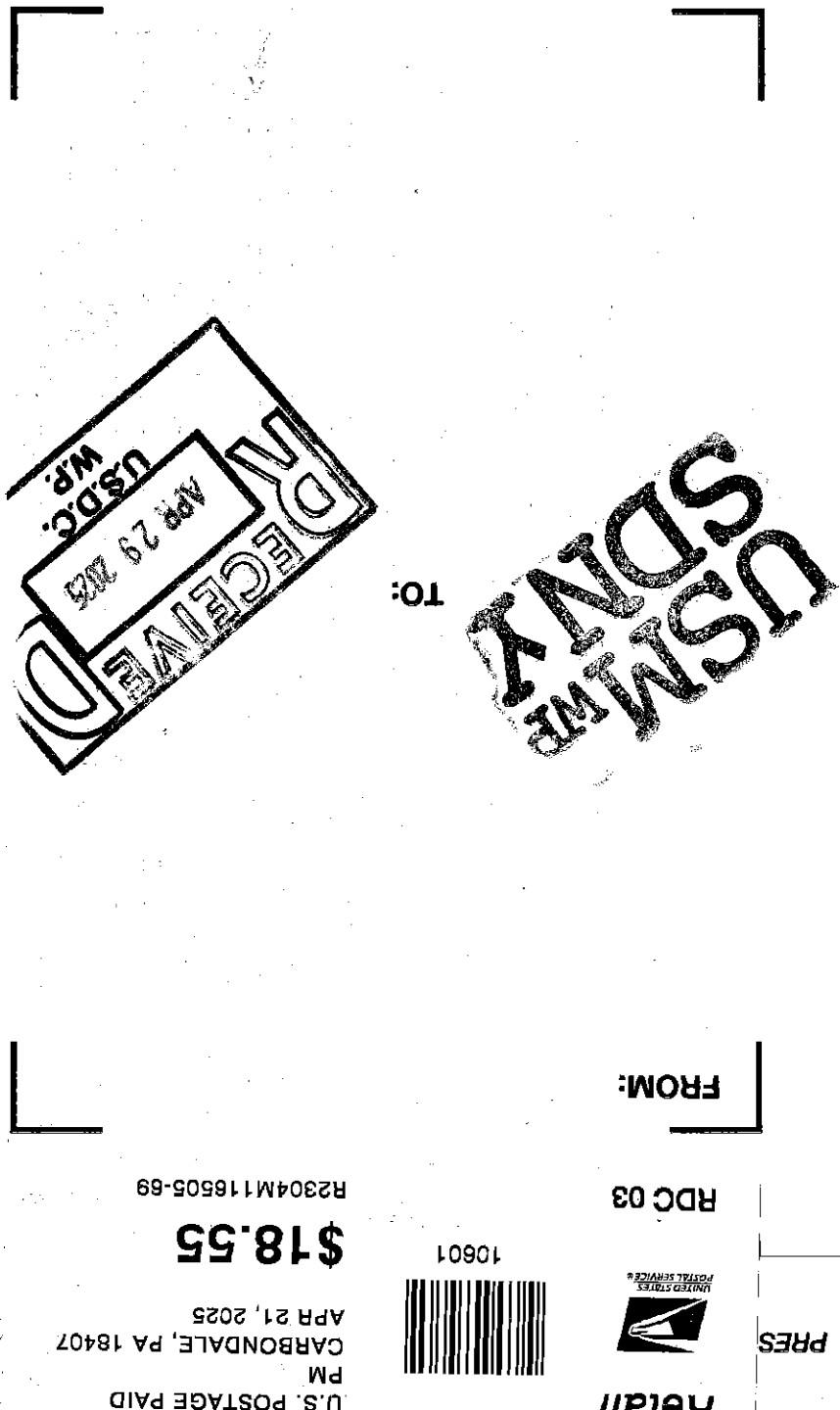
5 5. David D. Lin Esq. also failed to state a valid claim against the entity “Frankie’s  
6 Free Range Meat LLC,” as Frank Tufano associating with and promoting the  
7 business has nothing to do with Paul Saladino MD’s personal or business  
8 activities.

9  
10 Dated: April 21, 2025  
11

12 By: /s/ Frank Tufano  
13  
14

15 Frank Tufano  
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<p>7. \$50 of insurance (restrictions apply).*</p> <p>and many international destinations.  regarding claims exclusions see the  declaration form is required.</p>			
<p>8. Domestic use.</p> <p>Domestic Return Receipt</p>			